

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	<b>CASE NO.: 1:24-cr-00176-PAB-2</b>
	)	
<b>Plaintiff,</b>	)	<b>JUDGE PAMELA A. BARKER</b>
	)	
<b>v.</b>	)	
	)	
<b>AARON BETTS</b>	)	<b><u>DEFENDANT’S MOTION TO MODIFY</u></b>
	)	<b><u>CONDITIONS OF RELEASE</u></b>
<b>Defendant.</b>	)	
	)	

Now comes the Defendant, Aaron Betts, by and through undersigned counsel, Fernando Mack, and respectfully moves this Honorable Court to amend (modify) the conditions of his pretrial release pursuant to 18 U.S.C. § 3142(c)(3). In support of this Motion, the Defendant states the following:

1. The Defendant was charged with 11 counts in a 19-count indictment, including the following offenses: Count 6 – Attempted Smuggling of Goods from the United States; Count 7 – Conspiracy to Engage in Straw Purchasing of Firearms; Count 8 – Conspiracy to Traffic in Firearms; Count 9 – Firearms Trafficking; Count 10 – Providing Firearms to a Convicted Felon; Count 11 – Straw Purchasing of Firearms; Count 12 – Providing Firearms to a Convicted Felon; Counts 13 and 14 – Making False Statements During the Purchase of a Firearm; Count 17 – Possession of a Firearm in a School Zone; and Count 18 – Making a False Statement to Law Enforcement. The Defendant was then released on bond, subject to conditions imposed by the Court.
2. Among the conditions imposed, the Court ordered Defendant to:  
  
“Submit to the following location monitoring technology and comply with its requirements as directed: GPS and pay all or part of the cost of location monitoring based upon your ability to pay as determined by the pretrial services or supervising officer.”
3. The defendant respectfully requests that this Court modify the conditions of release to

remove the requirement for GPS ankle monitoring.

4. Since the time of his release, over one year ago, Defendant has been fully compliant with all conditions of release and has not incurred any new legal issues, arrests, or violations since being placed on pretrial supervision.
5. Defendant has consistently reported to his supervising officer and has demonstrated reliability and responsibility throughout the period of supervision.
6. The defendant's supervising officer (Parole Officer) is in agreement with this request to remove the GPS monitoring condition.

Given Defendant's consistent compliance, lack of violations, and the support of the supervising officer, the continued use of GPS monitoring is unnecessary to ensure either the safety of the community or Defendant's appearance in court. Should the Court deem a hearing necessary, both the Defendant and undersigned counsel will appear and are available at the Court's convenience.

WHEREFORE, the Defendant respectfully requests that this Honorable Court amend his pretrial release conditions to remove the GPS ankle monitoring requirement and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Fernando Mack, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically on this 3<sup>rd</sup> day of July 2025.

Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail.

*/s/ Fernando Mack, Esq.*

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